Remarks

Rejections under 35 U.S.C. § 103

Claims 1-2, 4-9, 16-18 and 20-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hipp in view of Abdo.

A claimed invention is obviated only when two or more references either alone, or in combination teach, disclose or suggest each and every element of the claimed invention. Applicants respectfully submit that one of ordinary skill in the art would not be motivated to combine Hipp and Abdo because such a combination would render Hipp unsuitable for its intended purpose. Further, Applicants submit that even if Hipp and Abdo were able to be combined, Hipp and Abdo, alone or in combination, fail to teach or suggest each and every element of the claimed invention.

Hipp is directed towards improving utilization of system resources by migrating and relocating an operating system executing on a server that has an insufficient amount of available resources, to another server having a sufficient amount of available resources. *See* Hipp, col 1. lines 39-59. Hipp clearly states that this application migration serves the "express purpose of making the application node-independent.[1] *See* Hipp, Abstract, lines 3-6. In contrast, Abdo uses auto-reconnect requests stored at a server, and auto-authenticate requests stored at a client, to establish or re-establish communications. *See* Abdo, Par. 26-27 and 35. The problems associated with operating system migration and relocation are very different from those presented by the re-establishment of communications. In particular, Hipp teaches a system having the "express purpose" of making an application node-independent, thereby addressing a common problem associated with operating system migration. Abdo, on the other hand, requires the storage of auto-reconnect data at the server, and storing the "reference to the server session for which the auto-reconnect data was generated" at the client, thereby addressing the problems of communications re-establishment by making the systems and methods disclosed in Abdo node-dependent. Combining the node-dependent user session disclosed in Abdo with the node-independent system disclosed in Hipp would frustrate

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[1] A node is defined as a particular machine running a given operating system at a specific moment in time.

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the "express purpose" of Hipp. Moreover, such a combination would not function. Thus, one of skill in the art would have no motivation to combine Hipp with Abdo.

Additionally, one would not be motivated to substitute the user session disclosed in Abdo for the application disclosed in Hipp because a user session is not an application. Hipp describes an application and not a user. *See* Hipp, col. 14, lines 4-14. The Examiner suggests that Hipp teaches applying IP virtualization to any application. *See* Advisory Action, p. 2. The user session disclosed in Abdo is not an application but rather a period of time during which the client can communicate with the server over a secure communications channel. *See* Abdo, paragraph 21. The user session is established when the server, using the RDP protocol and various encryption techniques, is able to establish a secure data communication channel between the server and client. *See* Abdo, paragraph 21. Thus, the user session disclosed in Abdo is not an application, and so there is no motivation to combine Hipp with Abdo for the purpose of substituting the application disclosed in Hipp with the user session disclosed in Abdo.

Even if one were to combine Hipp and Abdo, the resulting combination would still fail to disclose each and every element of the claimed invention. In particular, Hipp fails to disclose assigning, from a plurality of virtual host names, a second virtual host name, different from the first virtual host name, to a second user accessing the network via the first computer, as required by independent Claims 1 and 16. Further, Hipp fails to disclose associating the second virtual hostname of the second user with a second IP address and using both said second virtual hostname and said second IP address for network communications via the first computer, as required by independent Claims 1 and 16. What Hipp does disclose are systems and methods for assigning a single virtual address and a single virtual hostname to a single application instance. *See* Hipp, col. 13 lines 54-55. There is no disclosure or even suggestion in Hipp that more than one application executing on a single computer is assigned a virtual hostname and address. Given that Hipp does not disclose assigning a second virtual hostname and second virtual IP address to the second application, it follows that Hipp also does not disclose using a second virtual hostname and IP address for network communications. Thus, Hipp fails to disclose the above-mentioned elements required by independent Claims 1 and 16.

Abdo fails to cure the above-mentioned deficiencies present in Hipp because Abdo fails to disclose assigning virtual hostnames and IP addresses. Rather, Abdo discloses assigning a unique session ID. *See* Abdo paragraph 26. A unique session ID is not a virtual hostname or address, therefore Abdo does not cure the deficiencies present in Hipp.

Claims 3, 14-15, 19 and 29-30 are rejected under 35 U.S.C. § 103 as being unpatentable over Hipp in view of Abdo, and in further view of U.S. Patent No. 6,195,689 to Bahlmann ("Bahlmann".) Claims 10-13 and 25-28 are rejected under 35 U.S.C. § 103 as being unpatentable over Hipp in view of Abdo, and in further view of U.S. Patent No. 5,878,212 to Civanlar ("Civanlar".) Claims 3 and 10-15 depend on and incorporate all of the patentable subject matter of independent Claim 1, as amended. Claims 19 and 25-30 depend on and incorporate all of the patentable subject matter of independent Claim 16, as amended. Applicants respectfully traverse this rejection and submit that Hipp, Abdo, Bahlamann and Civanlar, alone or in combination, fail to disclose, teach or suggest each and every element recited in the claimed invention.

Bahlamann and Civanlar fail to disclose or suggest: assigning, from a plurality of virtual host names, a second virtual host name, different from the first virtual host name, to a second user accessing the network via the first computer; and associating the second virtual hostname of the second user with a second IP address and using both said second virtual hostname and said second IP address for network communications via the first computer. Thus, neither Bahlamann or Civanlar cure the deficiencies present in Hipp and Abdo.

Bahlamann and Civanlar, alone or in combination, fail to disclose or suggest each and every feature of amended Claims 1 and 16, as presented above, therefore Hipp, Abdo, Bahlamann and Civanlar, alone or in combination, also fail to disclose or suggest the features of dependent Claims 3, 14-15, 19 and 29-30. Thus, the Applicants respectfully submit that Claims 3, 14-15, 19 and 29-30 are patentable over Hipp in view of Abdo and in further view of Bahlamann, and Hipp in view of Abdo and in further view of Civanlar. Applicants therefore request the Examiner to reconsider and withdraw all rejections made under 35 U.S.C. §103.

Conclusion

The Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application, the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,
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